

**UNITED STATES DISTRICT COURT  
for the  
DISTRICT OF MASSACHUSETTS**

\_\_\_\_\_  
**Charles Mendes,  
Plaintiff**

**v.**

**United States of America,  
Defendants**  
\_\_\_\_\_

)  
)  
)  
) **Civil Action**

)  
) **No. 05-10912-DPW**  
)  
)  
)  
)

**JOINT MOTION TO EXTEND THE TIME WITHIN  
WHICH CLOSING PAPERS MUST BE FILED**

Now come the parties and by their undersigned counsel do respectfully move this Honorable Court to enlarge the time within which a Stipulation of Dismissal or an Agreement for Judgment must be filed with the Court up to and including March 16, 2007.

As grounds therefore, the parties state that they are actively engaged in consummating the settlement but an additional thirty (30) days is needed in order to do so.

Respectfully submitted,  
CHARLES MENDES,  
by his attorney,

/s/ Carolyn M. Latti  
Carolyn M. Latti  
BBO #567394  
Latti & Anderson LLP  
30-31 Union Wharf  
Boston, MA 02109  
(617) 523-1000

Respectfully submitted,  
United States of America,  
By its attorneys,

/s/ Thomas J. Muzyka  
Thomas J. Muzyka, Esquire BBO #365540  
Kenneth M. Chiarello, Esquire  
Clinton & Muzyka  
One Washington Mall, Suite 1400  
Boston, MA 02108  
Tel. (617) 723-9165

Dated: 2/14/07

CERTIFICATE OF SERVICE

I hereby certify that on February 14, 2007, I electronically filed Joint Motion to Extend the Time Within Which Closing Papers Must Be Filed with the Clerk of the Court using CM/ECF system which will send notification of such filing(s) to the following:

Thomas J. Muzyka,  
Kenneth M. Chiarello  
Clinton & Muzyka, P.C.  
One Washington Mall, Suite 1400  
Boston, MA 02108

Respectfully submitted for the  
the Plaintiff,

/s/Carolyn M. Latti  
Carolyn M. Latti  
Latti & Anderson LLP  
30-31 Union Wharf  
Boston, MA 02109  
617-523-1000  
clatti@lattianderson.com